# San Diego Regional Water Quality Control Board Orange County Municipal

## **Storm Water Permit**

July 19, 2001



Section F

Jurisdictional Urban Runoff Program

## Jurisdictional Urban RunoffManagement Program (URMP)

Land Use Planning for New Development and Redevelopment



Component F.1

Eric S. Becker

**Orange County Permit** 

Workshop I

July 19, 2001

### F.1 Land Use Planning

**Urban Runoff Management Program** 

**Land Use Planning** e.g., SUSMP

**Construction Phase** 

Existing Development (4 sub sections)

Other components (Education, Illicit Discharge, etc.)

## F.1 Planning Component

#### • Use Planning:

- Minimize impacts on receiving waters from new development and redevelopment
- Reduce pollutants and runoff flows to the maximum extent practicable (MEP)

#### Four Sections

- Assess General Plan
- Modify Development Project Approval Processes
- Revise Environmental Review Process
- Conduct Education Efforts

#### F.1.a Assess General Plan

- Requires Copermittees General Plan (or equivalent) to include water quality and watershed protection principles
  - Guide development decisions to consider and address water quality impacts
- Copermittees must submit workplan & time schedule for any changes to General Plan to include these principles

## F.1.b Modify Project Approval Processes

- Requires modification of development approval process to address runoff from:
  - All Development Projects
  - Priority Development Projects
- All Development Projects
  - Local permits must include requirements to reduce pollutants/flows to MEP
    - Must meet minimum requirements (F.1.b.1,Page 14)

- Priority Development Projects
  - Must develop Standard Urban Storm Water Mitigation Plans (SUSMPs) to address runoff from from new development and significant redevelopment
    - Model SUSMP within 365 days
    - Adopt Local SUSMP (amended ordinances) within 180 days of Model SUSMP

- 10 categories of Priority Development Projects (F.1.b.2.a, Pages 15-16)
- These projects result in large increases in impervious surfaces or are potential significant source of pollutants

- Copermittees must develop list of recommended post-construction source control and structural BMPs for these projects
  - The recommended BMPs must meet minimum requirements (F.1.b.2.b, Page 17)
- Structural treatment BMPs must also meet numeric sizing criteria based on volume or flow of runoff

- Additional SUSMP Requirements
  - Identify Pollutants or Conditions of Concern
  - Develop Implementation Process
  - Protect groundwater from Infiltration
    - Restrictions for Infiltration Structural BMPs (F.1.b.2.h, Page 19 & 20)
  - Maintain Downstream Erosion
    - Develop criteria to control peak flows and velocities

- Optional Provisions
  - Equivalent Numeric Sizing Criteria
    - Authorized by the Regional Board
  - Waiver provision
    - Applies to structural BMPs deemed infeasible
    - May transfer cost savings to mitigation fund

- SUSMPs requirements based on review of:
  - San Diego Municipal Storm Water Permit
  - Los Angeles Municipal Storm Water Permit
  - Public Comments
  - SWRCB Order No. 2000-11 (Appeal of LA Permit)

## F.1.c Revise Environmental Review Process

- Revise environmental review process
  - Include water quality considerations
  - Identify appropriate mitigation measures

#### F.1.d Education Efforts

- Implement Education Programs
  - Both Internally & Externally
    - Water quality laws/regulations
    - Water quality impacts from development
    - Methods to minimize impacts

## Jurisdictional Urban Runoff Management Program

### Section F.2

## Construction Component



#### F.2 Construction

#### **Urban Runoff Management Program**

Land Use Planning e.g., SUSMP

**Construction Phase** 

Existing Development (4 sub sections)

Other components (Education, Illicit Discharge, etc.)





## Construction Component Requirements

- Implementation of pollution prevention measures (F.2.a., Page 21)
  - No need to treat or control pollutants that are not generated.
  - More cost effective than treatment or cleanup.

## Update grading ordinances (F.2.b., Page 22)

- Develop ordinances which require:
  - pollution prevention
  - source control
  - structural treatment BMPs
- Ensures that conflicts don't exist between
   Grading and Storm Water Ordinances

## Modify conditions of approval (F.2.c, Page 22)

- Grading Permits
- minimize grading during wet season
- minimize areas that are cleared to portion necessary for construction
- Construction permits
- emphasize erosion prevention
- sediment controls are a supplement to erosion control, not the primary method.

## Identify sites in jurisdiction (F.2.d., Page 23)

Inventory all construction sitesregardless of size.

Watershed based inventory

## Prioritize sites based on threat to water quality (F.2.e, Page 23)

#### High Priority

- 50+ acres and wet season grading will occur,
   OR
- 5+ acres and tributary to 303d listed impaired water body, or discharging directly into receiving waters within an environmentally sensetive area.

## Based on prioritization

- Identify and require level of BMP implementation (F.2.f., Page 23)
  - Designate a minimum set of BMPs for high, medium and low priority sites.
  - Require implementation of designated BMPs year round.
  - BMP implementation requirements can vary based on wet and dry seasons.
  - More stringent controls may be required for sites with discharges tributary to 303d listed water bodies and environmentally sensitive areas.



## Inspection of Construction Sites (F.2.g, Page 24)

 Inspections shall include review of Erosion Control & BMP implementation plans

• Identify inspection frequency based on threat to water quality prioritization.

• Implement follow-up actions necessary to comply with Order 2001-193.

#### Enforcement

- Enforce Ordinances to Maintain Compliance (F.2.h., Page 24)
  - Grading permits
  - Storm Water Ordinance

• sanctions will be included to ensure compliance.

### Notification

• Notify SDRWQCB of Non-compliant Sites (F.2.I, Page 24)

- 24 hour oral notification

- written notice within 5 days of incidence

## Education (F.2.j, Page 25)

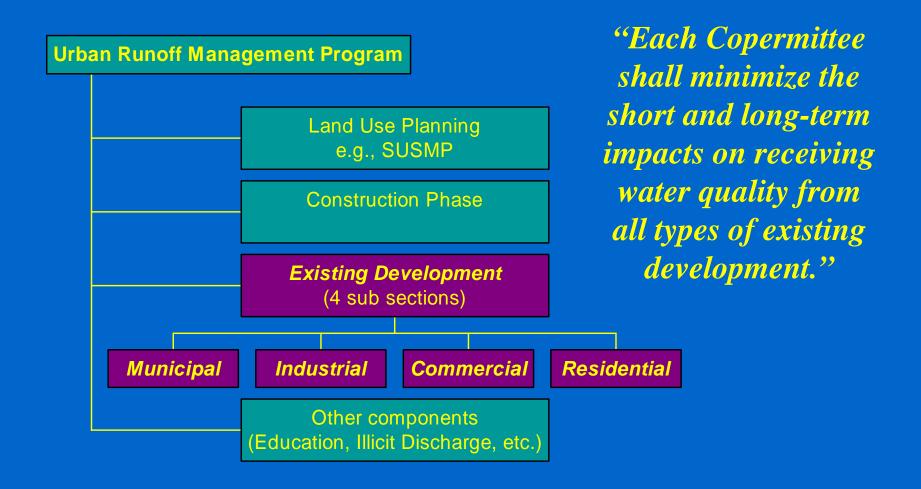
- Municipal Staff & Contractors,Developers, etc. need to:
  - Understand Federal, State, Local regulations
  - Understand connection between water quality impacts and construction practices
  - Understand Erosion Prevention
  - Understand how impacts to receiving waters from construction activities can be minimized

## Jurisdictional Urban Runoff Management Program (URMP)

## Existing Development



Jeremy Haas
Orange County Permit Workshop
July 19, 2001



### F.3 Existing Development

- Submitted w/ J-URMP to Principal Permittee w/in 1 year
- Implemented 1 year after adoption of Permit
- Categorized by 4 development or "use" types
  - Municipal
  - Industrial
  - Commercial
  - Residential

#### Identification and Prioritization

- Identify: Inventory of sites/runoff sources
- Prioritize: Classify sites based on threat to water quality
- Special attention to sites & activities that are "High Threats" to water quality
  - High threats can be based on activity or location

## Pollution Prevention & BMP Implementation

- Describe methods to prevent pollution from development types
- Designate BMPs for each development type, as appropriate
- Ensure BMPs are used for High Threat sites and activities (including adjacent to sensitive areas)

### Inspection & Enforcement

- Minimum inspection frequencies for some types of existing development
  - Follow-up actions
  - Report non-compliant industrial sites, but don't need to duplicate Regional Board inspectections
- Enforce local storm water ordinance

### F.4 Education

(P.33)

- Goal: reduce pollutant releases
- Measurably increase knowledge
- Change behavior
- Several target communities
  - Municipal staff
  - Construction
  - Industrial

- Commercial
- Residential
- Other agencies / districts

## F.5 Illicit Discharge Detection and Elimination

- Seek illicit discharges
  - dry weather monitoring (see Attachment E)
  - public reporting/complaints
- Investigate/Inspect/Follow-up
- Enforce ordinances & eliminate discharge
- Prevent sewage from entering MS4

"...implement a program to actively seek and eliminate illicit discharges and connections to its MS4."

## F.6 Common Interest Areas and Homeowner Associations

(P.37)

- Strategy to ensure runoff meets objectives of the Permit
- Describe steps taken in annual report

### Other J-URMP Components

(P.37)

- F.7 Public Participation in J-URMP
- F.8 Strategy to Assess J-URMP
   Effectiveness on Water Quality
- F.9 Strategy for Fiscal Analysis
  - to demonstrate sufficient financial resources to meet requirements

## Schedule and Reporting

#### All Copermittees

#### Within 1 year of adoption:

- Develop & implement URMP requirements
- Submit URMP to Principal Permittee (p. 38)

#### Annually:

- Jurisdictional URMP Annual Report
  - Prior to Jan. 31, 2003

#### Principal Copermittee

- Submit unified URMP and Annual Reports to Regional Board
- Report the collective actions of copermittees in annual report